

GLANKLER
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March 7, 2012

PRIVILEGED/CONFIDENTIAL

Mr. Dorsey E. Hopson II, General Counsel
Memphis City Schools
2597 Avery Avenue, Room 115
Memphis, Tennessee 38112

Re: [REDACTED] Investigation
Our File No. 21451.51968

Dear Mr. Hopson:

On February 23, 2012, Glankler Brown, PLLC was engaged to assist in an investigation undertaken in response to a complaint of sexual harassment made by [REDACTED] (hereinafter referred to as "Ms. [REDACTED]") on February 21, 2012, to Dr. Kriner Cash, the Superintendent for Memphis City Schools ("MCS"), with copies of the complaint also sent to you and Cerita Butler, the Interim Executive Director of Human Resources for MCS.¹ In the correspondence, Ms. [REDACTED] alleged that Dr. Irving Hamer, the Deputy Superintendent of Academic Operations, Technology & Innovation for MCS, sexually harassed her by making "several inappropriate, vulgar and degrading comments to" her in the presence of MCS employees.² We were asked to investigate the veracity of Ms. [REDACTED]'s complaint and to determine what, if any, actions should be taken in response to Ms. [REDACTED]'s complaint. In investigating this matter, we interviewed Ms. [REDACTED], Dr. Cash, and a number of other MCS employees, and reviewed certain documents submitted by these individuals. We also attempted to interview Dr. Irving Hamer, but were unable to do so prior to the completion of this report.

I. INTERVIEWS

A. [REDACTED]

On February 23, 2012, the undersigned met with Ms. [REDACTED] at the offices of Glankler Brown. Ms. [REDACTED] was hired by MCS in August 2006 as an Executive Secretary in MCS' Communications Department. Approximately one and one-half years after she was hired by MCS, she was promoted to the position of Program and Project Specialist in the

¹ See Ms. [REDACTED]'s February 21, 2012, correspondence to Dr. Cash attached hereto as Exhibit "A." Although the complaint is dated February 21, 2012, Dr. Cash did not actually receive Ms. [REDACTED]'s complaint until February 23, 2012.

² See Exhibit "A."

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Communications Department. In June 2008, Ms. [REDACTED] was promoted to the position of Executive Assistant to the Superintendent. In her role as Executive Assistant to the Superintendent, Ms. [REDACTED] reports directly to Dr. Kriner Cash and is responsible for managing Dr. Cash's calendar, school visits, speaking engagements, travel, presentations, and attending to the day-to-day needs of Dr. Cash.

According to Ms. [REDACTED], she was invited to attend a gathering that took place at Dr. Cash's residence on February 18, 2012. Dr. Cash invited his Executive Cabinet to attend the gathering as well as his administrative staff. Ms. [REDACTED] characterized the event as a social gathering. Near the end of the event, Dr. Hamer began making remarks to all of those in attendance regarding the work facing MCS employees as the merger with Shelby County Schools moves closer to fruition. Ms. [REDACTED] was standing between two MCS employees when Dr. Hamer looked in her direction and remarked to Willie Rhodes, the Southwest Regional Superintendent—"are you having a side bar with Ms. [REDACTED], don't you know she's married, I know she got some big titties, but she's married." Ms. [REDACTED] stated that everyone in attendance seemed shocked by Dr. Hamer's comment. Catherine Battle, the Northeast Regional Superintendent attempted to get Dr. Hamer back on track with his speech but Dr. Hamer once again made a comment about Ms. [REDACTED]—"I'm just so distracted by those big titties." After the second comment, Dr. Cash verbally scolded Dr. Hamer for his comments.

Ms. [REDACTED] was eventually directed to move outside of Dr. Hamer's line of vision until Dr. Hamer completed his remarks. According to Ms. [REDACTED], Dr. Hamer's remarks were awkward, humiliating, and embarrassing. The event concluded shortly after Dr. Hamer made his comments.

On Sunday, February 19, 2012, Ms. [REDACTED] received a telephone call from Dr. Cash, checking on her condition. Dr. Cash advised Ms. [REDACTED] that Dr. Hamer owed an apology to Ms. [REDACTED] as well as everyone else in attendance, for his remarks about Ms. [REDACTED]. On Monday, February 20, 2012, Ms. [REDACTED] received an e-mail that was sent from Dr. Hamer, with copies to other MCS employees in attendance at the event at Dr. Cash's residence.³ In the e-mail, Dr. Hamer apologized for his "crude and disrespectful comments" about Ms. [REDACTED].⁴ Dr. Hamer further stated that "[t]he only explanation for [his] behavior was [his] failure to recognize where we were, what we were doing, who was in attendance, and being too familiar with [Ms. [REDACTED]] and our colleagues."⁵ Ms. [REDACTED] advised that she was offended by this comment because any "familiarity" with Ms. [REDACTED] is limited to work done for and at MCS. Ms. [REDACTED] also stated that she believes this comment may lead others to think that Dr. Hamer had a reason to make the aforementioned remarks about Ms. [REDACTED].

³ See Dr. Hamer's February 21, 2012, e-mail to Ms. [REDACTED] attached hereto as Exhibit "B."

⁴ See Exhibit "B."

⁵ See Exhibit "B."

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Ms. [REDACTED] advised that while she is at work, she has little contact with Dr. Hamer. Dr. Hamer's office is down a hallway from Dr. Cash's office, and Ms. [REDACTED] typically only communicates with Dr. Hamer's assistant. Ms. [REDACTED] estimates that she communicates with Dr. Hamer 3-4 days each week. Ms. [REDACTED] further advised that any communications with Dr. Hamer are strictly work-related. Ms. [REDACTED] stated that she and Dr. Hamer have never had a personal or romantic relationship. Ms. [REDACTED] mentioned that, in the past, she has noticed Dr. Hamer staring at her on various occasions.

Ms. [REDACTED] advised that Dr. Hamer's comments at Dr. Cash's residence and Dr. Hamer's subsequent apology have caused Ms. [REDACTED] great embarrassment and humiliation. On Monday, February 20, 2012, Ms. [REDACTED] was permitted by Dr. Cash to take time off to cope with this situation. Ms. [REDACTED] believes that Dr. Hamer should receive some form of discipline for his actions. Ms. [REDACTED] also requests that she have very little to no interaction with Dr. Hamer going forward.

B. Dr. Kriner Cash.

On February 24, 2012, the undersigned conducted a telephonic interview of Dr. Kriner Cash. Dr. Cash is the Superintendent of MCS and has been employed in that position since 2008. [REDACTED] has been one of Dr. Cash's executive assistants from the very beginning of Dr. Cash's tenure with MCS. When Dr. Cash was hired by MCS as Superintendent, he hired Dr. Irving Hamer to serve as his Deputy Superintendent. Dr. Cash had previously worked with Dr. Hamer when both were employed by the Miami-Dade School System.

Dr. Cash advised that he invited his Executive Cabinet as well as his administrative staff to his residence on Saturday, February 18, 2012, to celebrate the work done by his team. Only MCS employees were invited to attend the event. Dr. Hamer prepared the main dish for the event, and the attendees were allowed to bring alcoholic beverages to the event. The event was scheduled to last from 7:00 p.m. to 9:00 p.m. Dr. Cash characterized the event as a "family"-type gathering, as it was one of the first social events he had attended with his Executive Cabinet since his wife passed away in late 2011.

Near the conclusion of the event, all of the attendees gathered in the living room/dining room area of Dr. Cash's residence. Dr. Hamer began to make a toast to the MCS employees. Dr. Cash characterized Dr. Hamer's toast as rambling and incoherent. Dr. Cash stated further that Dr. Hamer seemed intoxicated. A number of Dr. Hamer's actions led Dr. Cash to believe he was intoxicated including: (1) Dr. Hamer's nearly incoherent speech, (2) Dr. Hamer attempting to play music while Dr. Cash was speaking to those in attendance, and (3) Dr. Hamer falling to the floor on one occasion.

While Dr. Hamer was making his toast, Dr. Cash recalled Dr. Hamer referencing Ms. [REDACTED]'s breasts on at least two (2) occasions. Dr. Cash commented that he attempted to get Dr. Hamer to stay on point with his toast. After Dr. Hamer made the comments about Ms.

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██████████. Dr. Cash noticed that Ms. ██████████ seemed embarrassed by Dr. Hamer's comments. The event concluded shortly after Dr. Hamer addressed the attendees.

On Sunday, February 19, 2012, Dr. Cash contacted Dr. Hamer to discuss Dr. Hamer's comments about Ms. ██████████. Dr. Cash told Dr. Hamer that his statements at the event embarrassed and humiliated Ms. ██████████. Dr. Cash advised that during the conversation, Dr. Hamer took issue with Dr. Cash's account of Dr. Hamer's actions. Dr. Cash ordered Dr. Hamer to apologize, in person, to Ms. ██████████ as well as everyone in attendance at the event. Dr. Hamer agreed to apologize. Dr. Cash also called Ms. ██████████ to express his regrets for Dr. Hamer's actions.

Dr. Cash advised that he was surprised when he noticed on Monday, February 20, 2012, that Dr. Hamer had decided to apologize via e-mail rather than in person. In discussing Dr. Hamer's e-mail apology with Ms. ██████████, Dr. Cash noticed that Ms. ██████████ became tearful. Dr. Cash allowed Ms. ██████████ to take time off to cope with the stress of the situation. On or about February 23, 2012, Dr. Cash relieved Dr. Hamer of duty, with pay, pending the investigation of this matter. Dr. Cash advised that he was certain that Ms. ██████████ and Dr. Hamer have never had a personal or romantic relationship.

C. Dr. Irving Hamer.

Beginning February 23, 2012, the undersigned attempted to schedule an interview with Dr. Hamer. The undersigned left voice messages with Dr. Hamer on February 23 and 24, 2012. The undersigned also sent a text message to Dr. Hamer on February 24, 2012. The undersigned spoke briefly with Dr. Hamer on February 27, 2012. At that time, Dr. Hamer advised that he had retained an attorney, Pamela Shaw, to represent him with regard to this matter. The undersigned spoke with Ms. Shaw on February 28, 2012, in an attempt to schedule a mutually agreeable time to interview Dr. Hamer. Ms. Shaw advised that Dr. Hamer would not be available for an in-person interview until at least Wednesday, March 7, 2012. The undersigned then requested from Ms. Shaw to schedule a telephonic interview of Dr. Hamer. Ms. Shaw did not grant the undersigned's request for a telephonic interview. Therefore, the undersigned relies on Dr. Hamer's February 20, 2012, e-mail apology to Ms. ██████████, which is attached hereto as Exhibit "B", as Dr. Hamer's explanation of his actions.⁶

D. Other Employees.

During the course of this investigation, the undersigned interviewed MCS employees that attended the event held at Dr. Cash's residence on February 18, 2012, as well as other MCS employees. The attendees differed on the purpose of the event. Most of the attendees interviewed believed that Dr. Cash scheduled the event simply to socialize with his Executive Cabinet and administrative staff for the first time since the passing of his wife. Several attendees believed the event was a team building event in which Dr. Cash wanted to express his gratitude

⁶ Should the undersigned meet with Dr. Hamer in the future, this report will be supplemented, if necessary.

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to his employees. One of the attendees believed that the event was a hybrid social/work event. Also, one of the attendees believed the purpose of the event was to engender support for Dr. Cash as MCS progresses toward its merger with Shelby County Schools.

The attendees also differed on whether Dr. Cash's Executive Cabinet and administrative staff were required to attend the event. The vast majority of those interviewed believed that attendance at the event was voluntary. One or two of the individuals interviewed believed that attendance was mandatory. Everyone interviewed agreed that all of the members of Dr. Cash's Executive Cabinet were not in attendance.

Each of the attendees that heard Dr. Hamer speak at the event at Dr. Cash's residence heard Dr. Hamer reference Ms. [REDACTED]'s breasts at least once but not more than three times while everyone was gathered in one room. At least two individuals in attendance chided Dr. Hamer, including Dr. Cash, for his comments about Ms. [REDACTED]. The majority of the individuals interviewed believed that Dr. Hamer was intoxicated at the time he made the comments about Ms. [REDACTED]. Several individuals interviewed commented that Ms. [REDACTED] was noticeably embarrassed by Dr. Hamer's comments. Moreover, several individuals stated that Dr. Hamer's comments also made them feel uncomfortable and awkward.

None of the individuals interviewed was aware of any formal or informal complaints made about Dr. Hamer. However, at least two of the individuals interviewed stated that Dr. Hamer, on occasion, has made sexual-type jokes and comments that have been interpreted to be sexual in nature. The undersigned was apprised of another incident involving Dr. Hamer in which he allegedly made an inappropriate comment to another MCS employee in September 2011. The individual that was the subject of the comment drafted a "Formal Advisement" about the incident to Cerita Butler, MCS' Interim Director of Human Resources, on March 2, 2011.

The individuals interviewed were not aware of any personal or romantic relationship between Dr. Hamer and Ms. [REDACTED].

II. MCS' SEXUAL HARASSMENT POLICY/FEDERAL AND STATE LAW

MCS has adopted a policy prohibiting sexual harassment. The sexual harassment policy applies to all MCS employees. The purpose of the policy is to provide employees with a work environment free from harassment.

One of the definitions of sexual harassment under the MCS policy is "verbal or physical conduct of a sexual nature when . . . such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment." The MCS policy provides that "[a] hostile environment occurs when the harassing conduct is sufficiently severe, persistent or pervasive so as to limit the employee's ability to perform his/her job. A hostile environment can exist even when the harassment is targeted specifically at another individual." Examples of sexual harassment under the MCS policy include: (1) making graphic comments about a person's

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body or conduct; (2) making offensive jokes or gestures; and (3) unwelcome sexual flirtation or sexual propositions.

In order to establish a *prima facie* case of sexual harassment under federal or Tennessee law, one must adduce evidence demonstrating that: (1) she is a member of a protected class (female); (2) she was subjected to harassment, either through words or actions, based on sex; (3) the harassment had the effect of unreasonably interfering with her work performance and creating an objectively intimidating, hostile, or offensive work environment; and (4) there exists some basis for liability on the part of the employer. *Gallagher v. C.H. Robinson Worldwide, Inc.*, 567 F.3d 263, 270 (6th Cir. 2009).

III. CONCLUSIONS

Based on the interviews with a number of MCS employees in attendance at Dr. Cash's residence on February 18, 2012, and after reviewing certain documents provided by these employees, we draw the following conclusions:

1. Dr. Cash held an event at his residence on the evening of Saturday, February 18, 2012, and invited his Executive Cabinet and administrative staff to attend the event. This was a social event for certain MCS employees. Attendance at this event was not required.
2. As the event was about to conclude, Dr. Irving Hamer addressed those in attendance and made several graphic and inappropriate comments about [REDACTED]'s breasts. Nearly everyone in attendance heard Dr. Hamer's comments. At least two MCS employees, including Dr. Kriner Cash, chided Dr. Hamer for his comments about Ms. [REDACTED].
3. At the time Dr. Hamer made the inappropriate comments about Ms. [REDACTED], he was more likely than not intoxicated.
4. Ms. [REDACTED] was humiliated and insulted by Dr. Hamer's comments. Other attendees also felt uncomfortable and awkward as a result of Dr. Hamer's inappropriate comments.
5. Dr. Cash directed Dr. Hamer to apologize to Ms. [REDACTED] as well as everyone in attendance at the event at Dr. Cash's residence. On February 20, 2012, Dr. Hamer e-mailed Ms. [REDACTED] an apology in which he agreed that he referred to Ms. [REDACTED] in a "totally inappropriate way." Dr. Hamer apologized for his admittedly "crude and disrespectful comments."
6. Ms. [REDACTED] submitted a complaint of alleged sexual harassment to Dr. Cash on February 21, 2012 against Dr. Hamer. Dr. Cash received Ms. [REDACTED]'s complaint on February 23, 2012. Dr. Hamer was relieved of duty, pending investigation, on February 23, 2012.

7. Dr. Hamer's comments to and/or about Ms. [REDACTED] on the evening of February 18, 2012, at Dr. Cash's residence violate MCS' sexual harassment policy.

8. The undersigned is unaware of any formal or informal complaints of alleged sexual harassment that were made against Dr. Hamer prior to Ms. [REDACTED]'s February 21, 2012 complaint. During the course of this investigation, one or more MCS employees alleged that Dr. Hamer had made inappropriate comments and/or jokes to or around MCS employees.

IV. RECOMMENDATIONS

In response to Ms. [REDACTED]'s complaint of sexual harassment against Dr. Hamer, we make the following recommendations:

1. MCS should review past incidents of sexual harassment complaints for consistency in any action taken against Dr. Hamer.
2. If consistent, significant disciplinary action is warranted for Dr. Hamer's comments made about and/or to Ms. [REDACTED]. While acknowledging that the undersigned is not a member of management for MCS and has no authority to discipline MCS employees, the undersigned believes that, at a minimum, Dr. Hamer should be suspended, without pay, for a period of at least two (2) weeks. The undersigned is not aware of any formal or informal complaints that were made against Dr. Hamer prior to the complaint made by Ms. [REDACTED]. However, Dr. Hamer, as Deputy Superintendent of MCS, should be held to a higher standard based on the position of power he holds with MCS. Moreover, Dr. Hamer should set an example for other MCS employees.
3. MCS should require that Dr. Hamer submit to sexual harassment training.
4. MCS should invite that Dr. Hamer seek assistance, as needed, from MCS's EAP program.
5. As much as possible, MCS should attempt to limit or restrict any and all contact between Dr. Hamer and Ms. [REDACTED], as was requested by Ms. [REDACTED] in her complaint.
6. MCS should work to ensure that no employee suffers retaliation for initiating or participating in this investigation.

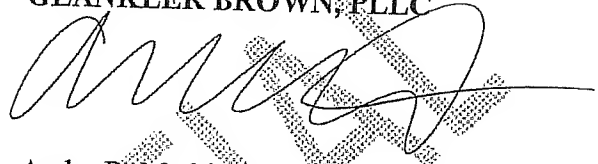
We thank you for allowing us to be of service in this matter and look forward to assisting you again in the future if the need arises. If you have any questions, do not hesitate to contact us.

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We are available to meet with you as needed.

Sincerely,

GLANKLER BROWN, PLLC

A handwritten signature in black ink, appearing to read "Andre B. Mathis", written over a large, faint, diagonal watermark that says "CONFIDENTIAL".

Andre B. Mathis

CONFIDENTIAL

February 21, 2012

Dr. Kriner Cash, Superintendent
Memphis City Schools
2597 Avery Ave. Rm. 214
Memphis, TN 38112

Dr. Cash:

Please accept this letter as my formal complaint against Dr. Irving Hamer, Deputy Superintendent, Memphis City Schools. On Saturday, February 19, 2012 I received a phone call from you extending an invitation for me to attend an Executive Cabinet gathering at your home later that evening from 7-9 pm. Most of the executive staff were present, and it was an evening filled with laughter, cocktails and great conversation. That is until Dr. Hamer made several inappropriate, vulgar and degrading comments to me, in the presence of you, Dorsey Hopson, and other MCS staff members.

The staff gathered in the living room of your home awaiting Dr. Hamer to bring remarks about the work we are faced with as MCS employees moving forward. I was standing in the middle of Mr. Willie Rhodes, Southwest Regional Superintendent and Dr. Terrence Brown, Southeast Regional Superintendent as Dr. Hamer begins to speak he looks over in my direction and says "Willie are you having a side bar conversation with Ms. [REDACTED], don't you know she's married, I know she got some big titties, but she's married". After Dr. Hamer made this statement, I looked around the room and I could tell that everyone present was shocked. It was a very awkward moment for me. I was shocked that he would say something so vulgar about me. After that Catherine Battle, Northeast Regional Superintendent attempted to get Dr. Hamer back on track with his speech. Dr. Hamer started to talk, and looked over at me again and said "I'm just so distracted by those big titties".

At this point I am totally embarrassed and humiliated. I couldn't believe what had just happened. I appreciate you speaking up immediately telling Dr. Hamer that you would put him out of your house if he didn't straighten up. One of the staff members, (I think it was Dr. Patricia Toarmina) recommended that I move to the other side of the room, so Dr. Hamer could finish giving his remarks without being distracted. Shortly after that you gave remarks and then everyone started to leave. I have never been so humiliated, embarrassed, and degraded in my life. Dr. Hamer's behavior that night was unacceptable.



Once I made it home on Saturday evening I tried to put all of this behind me, but this entire situation weighed heavily on me over the duration of my weekend and it still does. I greatly appreciate you calling to check on me the next day. During our conversation you stated that Dr. Hamer owed me an apology for sexually harassing me. You also stated that he needed to apologize to the staff as well and I agreed.

On the morning on Monday, February 20, 2012 when I arrived to work I had received an email from Dr. Hamer, titled apology (which is attached to this complaint). Once I received this so called "apology" it upset me even more. I can't believe that Dr. Hamer would have the nerve to say that he couldn't blame his behavior on alcohol and that the only explanation for his behavior was his failure to recognize where we were, what we were doing, who was in attendance and being too familiar with me and our colleagues. I am TOTALLY appalled by this statement! Dr. Hamer is in NO WAY familiar with me under any circumstances! The only familiarity that we share is the work that we do for MCS. I don't see or speak to Dr. Hamer outside of work! Any conversation that I have or have had with Dr. Hamer is strictly related to work.

I feel as if this statement was made, to lead others to believe that he has reason to talk to me in such a degrading way. Or that it's possible that he may have talked to me like this before, and that's absolutely false! Dr. Hamer's "apology" was written in a very misleading way and I feel that it attacks me personally and represents my character in a negative way. This "apology" email can definitely blemish my reputation as well as my career. The fact of the matter is Dr. Hamer sexually harassed me in the presence of you, Dorsey Hopson, MCS General Counsel, and other MCS staff members and this is totally unacceptable. I am humbly requesting that I have bare minimum or no interaction at all with Dr. Hamer. I trust you as a leader, and I know that the right form of discipline will be given for his vulgar and disrespectful comments.

Sincerely,

A large black rectangular redaction box covering the signature area.

cc: Dorsey Hopson, General Counsel

Cerita Butler, Interim Executive Director, Human Resources

Wincross

From: [REDACTED]
Sent: Wednesday, February 22, 2012 2:39 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Fwd: Apology

Sent from my iPhone

Begin forwarded message:

From: "IRVING HAMER" <HamerI@mcsk12.net>
Date: February 20, 2012 6:26:22 AM CST
To: [REDACTED]
Cc: SUPERINTENDENT CASH <Cashk@mcsk12.net>, Regional Superintendents <RegSupers@mcsk12.net>, RODERICK F RICHMOND <RICHMONDRF@mcsk12.net>, PATRICIA A TOARMINA <ToarminaP@mcsk12.net>, "denises@mcsk12.net" <denises@mcsk12.net>, MELVIN T BURGESS <burgessmt@mcsk12.net>, MARJORIE N DOUGLAS <DouglasMN@mcsk12.net>, DORSEY E HOPSON <HopsonDE@mcsk12.net>, DIANNE C FORTSON <FORTSONDC@MCSK12.net>, GERALD L DARLING <DARLINGGL@mcsk12.net>, WILLIAM E WHITE <WHITEWE@mcsk12.net>, LINDA O KENNARD <kennardlo@mcsk12.net>, "PAMELA ANSTEY" <AnsteyP@mcsk12.net>
Subject: Apology

[REDACTED]

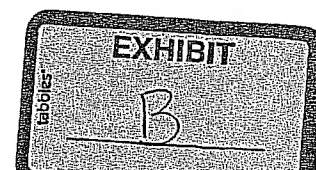
Upon reflection, I recall referring to you in a totally inappropriate way at the home of Superintendent Cash on Saturday evening. I apologize for my crude and disrespectful comments. I wish it were possible to blame my behavior on the consumption of alcohol--I cannot. I had two small drinks that evening. There was a third that I did not consume.

The only explanation for my behavior was my failure to recognize where we were, what we were doing, who was in attendance, and being too familiar with you and our colleagues. I am deeply sorry for victimizing you and causing the discomfort you experienced. It will never happen again.

I also regret being so vulgar with you and our colleagues. My remorse is deep and humiliating. Nonetheless, I take full responsibility for my comments.

Kindly accept my apology. Any consideration you can afford me during this moment of discomfort is requested and appreciated.

lh





Academic Operations, Technology & Innovation

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From the office of:
Irving Hamer
Deputy Superintendent, AOTI
Memphis City Schools
Web: www.mcsk12.net

March 12, 2012

Dr. Kriner Cash, Superintendent
Memphis City Schools
2597 Avery Avenue
Memphis, TN 38112

Dr. Cash,

I hereby tender my resignation effective April 30, 2012. I recognize and acknowledge that this is a critical time for TEI and other reform initiatives and projects at MCS. There are also time sensitive projects within my purview that require an appropriate transition plan. I propose that the transition planning and the associated briefing take place during the April 1-30, 2012 time period. This will ensure a smooth transition. From March 12-31, 2012 I will be on leave without pay.

Thank you for the opportunity to serve you, your administration, and the students of MCS. A cursory review of my portfolio of work will reveal substantial student and school growth. The lessons learned and the developments in the district are a testament to our teamwork.

Respectfully,

A handwritten signature in black ink, appearing to read "Irving Hamer", written over a horizontal line.

Irving Hamer

ih

C: Dorsey Hopson, Esq., MCS General Counsel